

Response to Question 9:

The application of *FRONTCOM.COM* qualifies for streamlined processing pursuant to 47 C.F.R. Section 63.12 because:

- 1) the applicant has no affiliation within the meaning of Section 63.18(h)(1)(i) with any foreign carrier in any destination market;
- 2) the applicant has no affiliation within the meaning of Section 63.18(h)(1)(i) with any dominant U.S. carrier whose international services the applicant seeks authority to resell; and
- 3) the applicant does not seek authority to provide switched basic services over private lines to any country.

Answer to Question 15

***FRONTCOM.COM* responds to 63.18 (d), (e)3 and (g) as follows:**

- (d)** *FRONTCOM.COM* has not received previous authority under Section 214.
- (e)3** *FRONTCOM.COM* requests Section 214 Authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1) and resale carrier pursuant to the terms and conditions of Section 63.18(e)(2).
- (g)** *FRONTCOM.COM* does not seek facilities-based authority as defined by Section 1.1306, therefore no environmental assessment as described in Section 1.1311 is applicable.